

### February 11, 2009 Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary

Office of the Secretary

Federal Communications Commission 445 12<sup>th</sup> Street, SW, Suite TW-A325

Washington, DC 20554

RE: Worldwide Telecommunications Inc. - 2008 CPNI Certification Filing

EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of Worldwide Telecommunications Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to <a href="mailto:rnorton@tminc.com">rnorton@tminc.com</a>.

Sincerely,

Robin Norton

Consultant to Worldwide Telecommunications Inc.

RN/lm

cc:

Best Copy and Printing, Inc. - FCC@BCPIWEB.COM

cc: file: Cheryl Lundy - Worldwide Worldwide - FCC

tms:

FCCx0901

Robin Norton

# ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year:

2008

Name of company covered by this certification:

Worldwide Telecommunications Inc.

Form 499 Filer ID:

824436

Name of signatory:

Cindy Osbrink

Title of signatory:

CEO & President

#### I, Cindy Osbrink, certify and state that:

- I am the CEO & President of Worldwide Telecommunications Inc. and, acting as an
  agent of the company, I have personal knowledge of Worldwide Telecommunications
  Inc.'s operating procedures as they relate to CPNI, and the Rules and Regulations of the
  Federal Communications Commission regarding CPNI.
- I hereby certify that, to the best of my knowledge, information and belief, Worldwide Telecommunications Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- Attached to this certification as Exhibit A is an accompanying statement explaining how
  the company's procedures ensure that the company is in compliance with the
  requirements set forth in section 64.2001 et seq. of the Commission's rules.

Cindy Osbrink CEO & President

Date\*

Exhibit A
Statement of CPNI Procedures and Compliance

# Statement of CPNI Procedures and Compliance For 2008

## Worldwide Telecommunications, Inc.

Worldwide Telecommunications Inc. is a long distance reseller providing non-telecommunications services as well 1+ service for use by payphone providers. We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our marketing efforts do not require the use of any client-specific information. Should we elect to use CPNI in any future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have put into place specific processes to safeguard our customers' CPNI and call detail information from improper use or disclosure by employees. Only three employees have access to this data. At weekly staff meeting, internal policies are addressed, including protection of client data from disclosure and CPNI regulations. In addition, annual staff meetings with the entire company are held where topics include the impact of CPNI rule changes on other departments' responsibilities (e.g. technology upgrades).

We have instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Our authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Only the primary client contact can request data over the phone, and that individual is required to respond correctly to specific "shared secret" questions each and every time prior to disclosure of any information. If the appropriate password is not provided, we require that the request for data must be submitted in writing and signed by a previously approved party. The information is then sent out using previously confirmed contact information (email, fax, mail address).

We have instituted authentication procedures to safeguard the disclosure of CPNI on-line which do not require the use of readily available biographical information or account information as defined by the FCC. We authenticate customers by providing unique access codes and passwords that are required in order for clients to obtain their data from the web. The passwords do not involve readily available biographical information or account information. Unless the appropriate password is provided, we do not allow on-line access to the client's data.

We have procedures in place to notify customers whenever a password, authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information. We do not send the notification to the new account information. We notify clients by phone only, and only to the primary contact on the account.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

Due to the nature of our business, the call detail we have is not tied to any presubscribed customers and does not include CPNI. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.